

Message

From: Tita LaGrimas [Tita.LaGrimas@tradebe.com]
Sent: 10/12/2017 3:58:07 PM
To: Valentino, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=29ccd101653e4a5fae2273a9ae9f7bd0-MValenti]
Subject: RE: SDS revenues ***CONFIDENTIAL***

Sensitivity: Company Confidential

Michael,

It was mailed to your attention and has been received by EPA's mail room on October 4th.

Tita LaGrimas
 Executive VP of Regulatory Affairs
 Tradebe Environmental Services, LLC

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 Merrillville, IN 46410 United States
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www.tradebeusa.com



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From: Valentino, Michael [mailto:Valentino.Michael@epa.gov]
Sent: Thursday, October 12, 2017 10:45 AM
To: Tita LaGrimas <Tita.LaGrimas@tradebe.com>
Subject: FW: SDS revenues ***CONFIDENTIAL***
Sensitivity: Confidential

Tita,

I think I understand now. CBI mailed = first phase of the substantiation claim and next phase is part 2.

Do you know who you mailed it to? If it went to Mike Cunningham I can ask him to send along to Kevin. If it came to me I may not see it until the 24th.

Thanks.
 Michael

From: Valentino, Michael
Sent: Thursday, October 12, 2017 10:42 AM
To: 'Tita LaGrimas' <Tita.LaGrimas@tradebe.com>
Subject: RE: SDS revenues ***CONFIDENTIAL***
Sensitivity: Confidential

I'm confused. When you say "the CBI was mailed" and "next phase of the CBI," can you clarify please? I am not following at all.

Sorry,

Michael

From: Tita LaGrimas [<mailto:Tita.LaGrimas@tradebe.com>]
Sent: Thursday, October 12, 2017 10:33 AM
To: Valentino, Michael <Valentino.Michael@epa.gov>
Subject: RE: SDS revenues ***CONFIDENTIAL***
Sensitivity: Confidential

Good morning Michael!

The CBI was mailed several days ago to you. I will have the UPS tracked. We are now working on the next phase of the CBI, and as you instructed, will send to Kevin's attention.

With regards to percent, it will be submitted separately to you. I will check on the information status, as we are waiting for Sergio review

Respectfully,
 Tita

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From: Valentino, Michael [<mailto:Valentino.Michael@epa.gov>]
Sent: Thursday, October 12, 2017 10:25 AM
To: Tita LaGrimas <Tita.LaGrimas@tradebe.com>
Subject: RE: SDS revenues ***CONFIDENTIAL***
Sensitivity: Confidential

Tita,

I will be out of the office Oct 13-23.

If I recall, the CBI substantiation claim letter did not say to whom your letter should be addressed. If you have not sent it out yet, I would cc Kevin Chow, Assistant Regional Counsel, Office of Regional Counsel, Mail Code C-14J. That way, Kevin (who will be doing the actual review – not myself) will have a copy of the letter and not have to wait until the 24th.

As to the % revenue from SDS, is that coming in a separate letter or email? I'm not sure what to expect.

Thank you,
 Michael

From: Tita LaGrimas [<mailto:Tita.LaGrimas@tradebe.com>]
Sent: Tuesday, October 10, 2017 10:20 AM
To: Valentino, Michael <Valentino.Michael@epa.gov>
Subject: RE: SDS revenues ***CONFIDENTIAL***
Sensitivity: Confidential

Good morning Mr. Valentino,

I wanted to let you know that we are continuing our work on the response to your email below as well as the ETC letter. A draft has been completed but several individuals internally need to review and comment. I will provide you a new update before the end of the week.

I hope you have a fantastic weekend!

Respectfully,

Tita

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From: Valentino, Michael [<mailto:Valentino.Michael@epa.gov>]
Sent: Monday, October 02, 2017 8:05 AM
To: Tita LaGrimas <Tita.LaGrimas@tradebe.com>
Subject: SDS revenues ***CONFIDENTIAL***
Importance: High
Sensitivity: Confidential

CONFIDENTIAL-CBI
 DO NOT RELEASE UNDER FOIA

Tita:

I don't believe the following question was asked of Tradebe, either at last week's meeting or when you met here in Region 5 earlier in the year.

PBI / Ex. 4

In the Rineco court case, government expert witness Donald Corwin reported that of Rineco's revenue stream from its TMWs, more than 99% of the revenue was obtained from the facility's receipt of hazardous waste and less than 1% from the sale of recovered metals. Therefore, a factor in establishing legitimacy is the realization of actual economic benefit from recycling a commodity that is used as an effective substitute for a commercial product. Rineco did not pass that test.

Also, has Tradebe at any time laid out a point-by-point analysis of SDS's recycling process per the conditions found at 40 CFR 260.43? If so, would you be willing to provide that?

Responses to the above can be included with your ongoing CBI substantiation response.

Thank you,
Michael